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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CRM HOLDINGS, LTD., ET. AL.

*PLAINTIFFS*

v.

CORPORATE RISK MANAGEMENT,  
INC.

Civil Action No.  
1:07-CV-6399 (PAC)

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: DEC 14 2007

*DEFENDANT*

**JOINT STIPULATION REGARDING BRIEFING SCHEDULE CONCERNING  
PLAINTIFF'S MOTION TO DISMISS THE COMPLAINT PURSUANT TO  
FED.R.CIV.P. 12(b)(1)**

Plaintiffs CRM Holdings, Ltd. and Compensation Risk Managers, LLC (collectively, "CRM") and defendant Corporate Risk Management, Inc. ("Corporate Risk Management"), by and through counsel, hereby stipulate and move for a sixty (60) day enlargement of time for the briefing schedule pertaining to Corporate Risk Management's motion to Dismiss the Complaint Pursuant to Fed. R. Civ. P. 12(b)(1) ("the Motion") and state as follows:

1. The parties in good faith represent that they are in settlement negotiations which, if successful, will resolve all matters and things in dispute.
2. The Court originally set the briefing schedule for the Motion at the Pre-Motion Conference held on October 1, 2007.
3. Corporate Risk Management Filed its Motion on October 23, 2007.
4. The Court granted a previous enlargement of time of 30 days to allow for time for settlement. The parties have continued settlement discussions and reasonably estimate that an additional sixty (60) days (given the upcoming holiday season) will enable the parties to determine whether settlement is possible at this time.

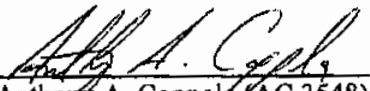
5. The parties stipulate that the amended briefing schedule for the Motion shall be as follows:

CRM's Opposition, previously due to be filed by December 14, 2007 will now be Due on **February 12, 2008**; and

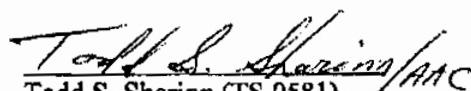
Corporate Risk Management's Reply, previously due to be filed by December 21, 2007 will now be due on **February 19, 2008**.

6. This stipulation is not made for purposes of delay, and the enlargement of time will not prejudice any party.

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Attorney for Plaintiff

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SO ORDERED THIS 14th Day of Dec 2007

  
UNITED STATES DISTRICT JUDGE